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CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY QJ DEPUTY CLERK

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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 EVAN PALMER,

15 Defendant.  
16

CASE NO. **2:19 - CR - 225 - JAM**

18 U.S.C. § 1040(a)(2) – Fraud in Connection with a  
Major Disaster or Emergency Benefits

17 INDICTMENT

18 The Grand Jury charges:

19 EVAN PALMER,

20 defendant herein, as follows:

21 I. INTRODUCTION

22 At all times relevant to this indictment:

23 1. The Federal Emergency Management Agency, also known as FEMA, was an agency of  
24 the United States government within the Department of Homeland Security (DHS). FEMA's  
25 responsibilities included, among other things, providing disaster assistance to individuals in an area  
26 declared a major disaster by the President of the United States of America. The President could declare  
27 a major disaster for any natural event that the President determined had caused damage of such severity  
28 that it was beyond the combined capabilities of the state and local governments to respond.

1           2.       On or about November 12, 2018, the President of the United States of America declared a  
2 major disaster existed in California due to damage resulting from wildfires that began on November 8,  
3 2018. FEMA designates major disasters by name and number. A major disaster declaration number is  
4 preceded by the letters "DR." The name of the disaster typically relates to the type and/or location of  
5 the disaster. FEMA designated the above identified disaster as: California Wildfires (DR-4407).

6           3.       As a result of this presidential declaration, residents of Butte County who were affected  
7 by what has become known as the Camp fire became eligible to apply for disaster assistance from  
8 FEMA.

9           4.       FEMA offered various types of disaster assistance to residents in the areas affected by the  
10 California wildfires, including through the Individuals and Households Program. The Individuals and  
11 Households Program provided financial assistance and direct services to eligible persons in the form of  
12 Housing Assistance and Other Needs Assistance. Housing Assistance and some forms of Other Needs  
13 Assistance, were available only to an otherwise qualified applicant whose pre-disaster primary residence  
14 incurred disaster-related damage.

15                   **II.       FRAUD IN CONNECTION WITH A MAJOR DISASTER**

16           5.       Defendant herein, on or about December 17, 2018, in the State and Eastern District of  
17 California, did knowingly make a materially false, fictitious, and fraudulent statement and  
18 representation, in a matter involving a benefit authorized, transported, transmitted, transferred,  
19 disbursed, and paid in connection with a major disaster declared under the section 401 of the Robert T.  
20 Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. § 5170) and where the benefit was a  
21 record, voucher, payment, money and thing of value of the United States and of a Department or Agency  
22 of the United States; and the benefit was transported in the mail at any point in the authorization,  
23 transmission, transfer, disbursement, and payment of that benefit; and the authorization, transportation,  
24 transmission, transfer disbursement, and payment of the benefit was in and affected interstate and  
25 foreign commerce; that is: the defendant knowingly made a false, fictitious, and fraudulent claim for  
26 FEMA assistance in connection with major disaster DR-4407, wherein defendant claimed that a travel  
27 trailer located at 4440 Clark Road #1, Paradise, California, was his primary residence at the time of the  
28 wildfire (DR-4407). In truth and fact, the travel trailer was not the defendant's primary residence,

1 and defendant was residing in a home in Chico, California. As a result of defendant's false claim, he  
2 received benefits including cash payments of approximately \$26,490.67. All in violation of Title 18,  
3 United States Code, Section 1040(a)(2).

4 A TRUE BILL.

5 **/s/ Signature on file w/AUSA**

6 FOREPERSON

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8 McGREGOR W. SCOTT  
9 United States Attorney  
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**United States v. Evan Palmer**  
**Penalties for Indictment**

**COUNT 1:**

**VIOLATION:** 18 U.S.C. § 1040 (a)(2) - Fraud in Connection with a Major Disaster or  
Emergency Benefits

**PENALTIES:** 30 years in prison;  
Fine of up to \$250,000; or both fine and imprisonment  
Supervised release of at least 5 years up to life

**SPECIAL ASSESSMENT:** \$100 (mandatory on each count)

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

*Eastern District of California*

*Criminal Division*

**THE UNITED STATES OF AMERICA**

vs.

**EVAN PALMER**

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**I N D I C T M E N T**

**VIOLATION(S): 18 U.S.C. § 1040(a)(2) –  
Fraud in Connection with a Major Disaster or Emergency Benefits**

*A true bill,*

**/s/ Signature on file w/AUSA**

\_\_\_\_\_  
*Foreman.*

*Filed in open court this* 12 *day*

*of* DECEMBER *, A.D. 20* 19

\_\_\_\_\_  
*Clerk*

*Bail, \$* \_\_\_\_\_

\_\_\_\_\_  
*Am. Chi.*

**~~NO BAIL WARRANT PENDING HEARING~~**